

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

May 8, 2015

VIA E-MAIL AND REGULAR MAIL

FILE COPY

Rathon Corporation
c/o Mr. Michael J. Glade, P.E.
Vice President
P.O. Box 4030, Suite 400
Golden, Colorado 80401

The Hillshire Brands Company
c/o Mr. Kent B. Magill, Esq.
Executive Vice President
400 South Jefferson Street
Chicago, Illinois 60607

Re: Voluntary Remediation Program Semi-Annual Status Report, February 16, 2015
Former Oxford Chemical Property (Rathon), Sublisted to HSI Site No. 10072
5001 Peachtree Blvd, Chamblee, DeKalb County, Georgia
Tax Parcel 18-278-14-002

Dear Messrs. Glade and Magill:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) Semi-Annual Status Report for the former Oxford Chemical Site dated February 16, 2015. EPD has considered the conclusions and recommendations of the Report as well as subsequent discussions during the meeting held at EPD offices on April 29, 2015. Our comments regarding the reports and subsequent discussions are detailed below

1. Section 2.2.1 indicates that calculated groundwater Vapor Intrusion Screening Levels (VISLs) are found in Table 2, but the table does not include them. Please submit calculated VISL values and documentation of the calculations, which could be a copy of the VISL spreadsheet that indicates input parameters. Please note that site specific information such as soil type attenuation factors, groundwater temperature, etc. can be factored into VISL calculations.
2. Section 2.2.3 concludes that no further assessment for vapor intrusion (VI) associated with Oxford Chemical releases at the PVP Properties is necessary. Although EPD recognizes that current conditions are below target risks, there is still potential for future risk. Modeling may indicate potential for groundwater concentrations to increase, or building type may change, both of which could result in elevated VI risk. EPD is amenable to allowing the existing Brownfield Limitation of Liability to serve as the institutional control for these properties rather than requesting a covenant.
3. Per sections 3.0 and discussions on April 29th, Rathon will be evaluating additional lines of evidence for VI potential on downgradient properties across Peachtree Boulevard (PB), including revised VISL calculations, groundwater modeling, and possibly soil gas sampling. Based on the historical, current, and expected future use of the PB corridor, EPD concurs that the analysis may be run assuming a non-residential scenario.
4. Some issues with groundwater sampling were noted, but EPD recognizes that these may be associated with simple reporting errors as opposed to actual sampling procedures. For

MW-4, MW-9, and MW-20, the pump intake depth was indicated to be above the screened interval. To adhere to EPA low-flow sampling guidance SESDPROC-301-R3, the pump intake level should be placed at the midpoint of the screened interval. Please ensure that this and other procedures are uniformly adhered to and accurately reported.

Please continue to account for all EPD comments in forthcoming reports in accordance with the Act. EPD may, at its sole discretion, review and comment on documents submitted by Rathon Corporation and Hillshire Brands Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Rathon Corporation and Hillshire Brands Company from complying with the provisions, purposes, standards and policies of the Act.

The next semi-annual progress report is due July 2, 2015. If you have any questions, please contact Jake Carpenter at (404) 657-8656.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Leonard J. Diprima, P.G., United Consulting, Inc.

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